
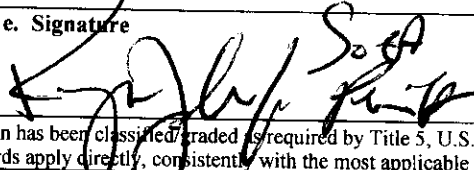
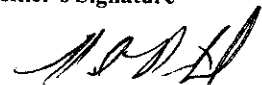


United States Environmental Protection Agency POSITION DESCRIPTION COVERSHEET		1. DUTY LOCATION Washington, DC		2. POSITION NUMBER EPE517028	
3. CLASSIFICATION ACTION: a. Reference of Series and Date of Standards Used to Classify this Position					
	b. Title	c. Pay Plan	d. Series	e. Grade	f. CLC
Official Allocation	Season Counsel to the Assistant Administrator for Ash and Radonson	ES	905	00	
4. Supervisor's Recommendation					
5. ORGANIZATIONAL TITLE OF POSITION (if any)			6. NAME OF EMPLOYEE DAVID HARLOW		
7. ORGANIZATION (Give complete organizational breakdown)			e.		
a. U.S. ENVIRONMENTAL PROTECTION AGENCY			f.		
b. OFFICE OF AIR AND RADIATION			g.		
c. Immediate Office			h. Employing Office Location WASHINGTON, DC		
d.			i. Organization Code L0000000		
8. SUPERVISORY STATUS					
<input type="checkbox"/> [2] Supervisor or Manager. Position requires the exercise of supervisory or managerial responsibilities that meet, at least, the minimum requirements for application of the General Schedule Supervisory Guide (GSSG) or similar standards for minimum supervisory responsibility specified in other position classification standards. <input type="checkbox"/> [4] Supervisor. Position meets the definition of Supervisor in 5.U.S.C. 7103(a)(10), but does not meet the minimum requirements for application of the GSSG. <input checked="" type="checkbox"/> [5] Management Official. Position meets the definition of Management Official in 5.U.S.C. 7103(a)(11), but does not meet the GSSG definition of Supervisor/Manager or the definition of Supervisor in 5.U.S.C. 7103(a)(10). <input type="checkbox"/> [6] Lead Position leads a team performing one-grade interval work and meets the minimum requirements for application of Part I of the Work Leader Grade Evaluation Guide (WLGE) or is under a wage system and meets similar minimum requirements as specified by those job standards or other directives of the applicable pay system. <input type="checkbox"/> [7] Team Leader. Position leads a team performing two-grade interval work and meets the minimum requirements for application of Part II of the WLGE. <input type="checkbox"/> [8] All Other Positions. Position does not meet any of the above definitions. This is a non-supervisor/non-managerial position.					
9. SUPERVISORY CERTIFICATION I certify that this is an accurate statement of the major duties and responsibilities of this position and its organizational relationships and that the position is necessary to carry out governmental functions for which I am responsible. The certification is made with the knowledge that this information is to be used for statutory purposes relating to appointment and payment of public funds, and that false or misleading statements may constitute violations of such statutes or their implementing regulations.					
a. Typed Name and Title of Immediate Supervisor Sarah Dunham, Acting AA, OAR			d. Typed Name and Title of Second-Level Supervisor Scott Pruitt, Administrator		
b. Signature 		c. Date 9/5/2017	e. Signature 		f. Date 8/16/17
10. OFFICIAL CLASSIFICATION CERTIFICATION: I certify that this position has been classified/graded as required by Title 5, U.S. Code, in conformance with standards published by the U.S. Office of Personnel Management or, if no published standards apply directly, consistently with the most applicable published standards.					
<input checked="" type="checkbox"/> a. Promotion Potential This position has no promotion potential <input type="checkbox"/> If position develops as planned and employee progresses satisfactorily, this position has known promotion potential to grade:					
b. PSB Risk Designation <input type="checkbox"/> 1 Low <input type="checkbox"/> 2 Moderate <input checked="" type="checkbox"/> 3 High Security Clearance Required: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		c. Financial Disclosure Form <input type="checkbox"/> OGE-450 Required <input checked="" type="checkbox"/> OGE-278 Required <input type="checkbox"/> No financial disclosure forms required		d. "Identical, Additional" (IA) Allocation This position <input type="checkbox"/> may be IA'ed <input checked="" type="checkbox"/> may not be IA'ed <input type="checkbox"/> is limited to current incumbent	
		e. FLSA Determination <input type="checkbox"/> NONEXEMPT <input checked="" type="checkbox"/> EXEMPT* (*check exemption category) <input type="checkbox"/> Administrative <input type="checkbox"/> Professional <input checked="" type="checkbox"/> Executive		f. Functional Classification Code	
g. Bargaining Unit Code 8888		h. Check, if applicable: <input type="checkbox"/> Medical Monitoring Required <input type="checkbox"/> Extramural Resources Management Duties (___ % of time) <input type="checkbox"/> This position is subject to random drug testing (___)		i. Classifier's Signature 	
				j. Date 09/07/17	
11. REMARKS					

**SENIOR COUNSELOR TO THE ASSISTANT ADMINISTRATOR
OFFICE OF AIR AND RADIATION
ES**

INTRODUCTION

This position is located in the Office of the Assistant Administrator for Air and Radiation (OAR). OAR implements the Clean Air Act and other statutes and manages voluntary programs for the purpose of meeting EPA's goals for climate change, indoor and outdoor air quality and radiation protection. The incumbent serves as the Senior Counselor and assists the Assistant Administrator (AA) for Air and Radiation in managing the office's implementation of selected programs.

MAJOR DUTIES AND RESPONSIBILITIES

1. Oversees programmatic activities within OAR that support achievement of administration priorities in the areas of carbon pollution, renewable energy and energy efficiency, and methane and hydrofluorocarbon emissions.
2. Represents the AA at meetings and forums with Members of Congress or their staffs, state officials, senior Administration officials and officials from government agencies and major regulated industries, nongovernmental organizations, and foreign governments. Anticipates contrary viewpoints and actively intervenes in consultations and negotiations that seek to resolve complex regulatory or legislative blockages.
3. Reviews and analyzes significant OAR actions for potential implications (legal, congressional, economic) to ensure that important issues are identified and addressed by the appropriate offices in OAR and the Agency. Oversees OAR's participation in projects to analyze and evaluate the environmental and policy implications of regulatory changes or pending environmental legislation. Provides recommendations on action to be taken in response to these evaluations.
4. Coordinates with the Office of General Counsel in conducting legal research and development of legal advice on extremely complex and difficult legal issues that present unprecedented and controversial problems and issues and which are highly visible, and on strategies for the disposition of particularly complex or sensitive litigation, serving as the focal point in coordinating with the General Counsel on litigation issues affecting OAR and participating in especially complex or sensitive settlement discussions as appropriate. Incumbent oversees the preparation of memoranda or reports that clearly state the factual basis of the proposed action, explain the legal issues involved and justify all recommendations and conclusions.
5. Provides continuing guidance, information and assistance to senior-level managers within OAR regarding highly urgent and sensitive management, regulatory, program policies, programs, and related topics. Reviews regulations, policy documents, reports, and other materials of special importance to the Assistant Administrator to ensure they are legally sound and reflect the point of view of the Agency and the Administration.

SUPERVISORY CONTROLS

Receives broad general direction and policy guidance from the Assistant Administrator. Within this framework, incumbent is afforded wide latitude in the exercise of initiative and judgment in performing assigned duties in a highly independent manner, including, where appropriate, by means of working with senior OAR managers in the deployment of staff as needed on relevant tasks. Work is subject to review only for attainment of overall objectives and compliance with broad policies.

LIMITATION OF AUTHORITY

The incumbent's duties will not extend to issuing legal opinions or final decisions regarding the legal sufficiency of an EPA action, or the interpretation of a statute, regulation, Executive Order, agreement, or contract.

The incumbent is responsible for coordinating legal advice with the EPA Office of General Counsel (OGC) and assuring that such legal advice is consistent with OGC policies, opinions, and interpretations.

The incumbent is responsible for coordinating legal enforcement advice with the EPA Office of Enforcement and Compliance Assurance (OECA) and assuring that such legal enforcement advice is consistent with OECA policies, opinions, and interpretations.

The incumbent is not authorized to identify himself/herself in any internal or external document, communication, correspondence, filing, or the like in a manner that creates the appearance that the incumbent represents EPA in a legal capacity, unless authorized by the General Counsel or his/her designee.

QUALIFICATIONS

The incumbent must have an LL.B. or J.D. degree from an accredited law school; must be admitted to practice before the highest court of a State, U.S. territory, the District of Columbia, or the Commonwealth of Puerto Rico; and must maintain active status as a member of the bar of one of these jurisdictions. Incumbent must have significant experience in providing legal advice and counsel at the EPA, other federal, state, or local agencies, or in private practice.